



**HOME INVESTMENT PARTNERSHIP  
PROGRAM**

**AMERICAN RESCUE PLAN  
(HOME-ARP)**

**ALLOCATION PLAN**

**FEBRUARY 2022**

# HOME-ARP Allocation Plan Template

## Guidance

- To receive its HOME-ARP allocation, a PJ must:
  - Engage in consultation with at least the required organizations;
  - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
  - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
  - Affirmatively Further Fair Housing;
  - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
  - Anti-Lobbying;
  - Authority of Jurisdiction;
  - Section 3; and,
  - HOME-ARP specific certification.

**Participating Jurisdiction:** City of Columbia, Missouri

**Date:** 2/22/2022

## Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

### ***Summarize the consultation process:***

On October 11, 2021 the City of Columbia’s Housing Programs Department sent a request to thirty-six (36) local agencies and organizations whose clientele include HOME-ARP qualifying populations. The agencies were asked to provide specific information regarding unmet needs

and gaps in housing or service delivery systems. The agencies were also invited to a HOME-ARP Pre-Application Workshop which was held on October 26, 2021. The Pre-Application Workshop included information regarding HOME-ARP Qualifying Populations and eligible HOME-ARP activities. Twelve agencies provided responses to the HOME-ARP consultation request. The information provided by the agencies was compiled and provided to the Housing and Community Development Commission ahead of their November 3, 2021 public hearing on HOME-ARP. The agency feedback centered on unmet needs and gaps in housing that exist in our community.

*List the organizations consulted, and summarize the feedback received from these entities.*

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>The Salvation Army</b>	Non-Profit Agency	Email request	<p>The shelter served 324 unduplicated people between 10/1/20 to 10/1/2021 including 72 veterans, 27 chronically homeless, 80 with a history of domestic violence and 32 fleeing domestic violence. All 324 with income under \$2000 per month. Social Services served 1304 from 10/1/20-10/1/21 providing over \$40,000 in rental and utility assistance.</p> <p>Unmet Housing Needs Include: Limited affordable housing, limited landlords willing to work with at risk populations, limited public transportation</p> <p>Unmet needs for those currently housed populations at risk for homeless include limited public transportation.</p> <p>Unmet needs for other families requiring services include: limited budget curriculum, limited rental and utility assistance programs.</p> <p>Current resources available to assist qualifying populations include Year round emergency shelter that houses single men, women, and adults with children, congregate public meals at the</p>

			<p>emergency shelter, TBRA vouchers, RRH vouchers, Section 8 vouchers.</p> <p>Current gaps in shelter, housing inventory, and service delivery are Lack of affordable housing, lack of landlords willing to work with at risk populations, high rental deposits, high rental application fees.</p> <p>Characteristics of housing associated with instability and increased risk of homelessness include: Affordable housing units in poor shape, landlords don't invest in up keep and/or repairs.</p> <p>Priority Needs include: Affordable housing units, program to help clean the slate for at risk tenants</p> <p>How the level of need and gaps were determined: Case managers at social service agencies screen clients for housing priority and they are place on prioritization list. Housing voucher awards are based on client's placement on the prioritization list.</p>
<b>Voluntary Action Center</b>	Non-Profit Agency	Email Request	<p>1. VAC provides services to residents of Boone County whose income is at or below 200% of Federal Poverty Guidelines. Additional guidelines may be applicable, such as with the ESG which serves residents below 30% of Average Median Income, ESG-Covid and MHTF both of which serve residents below 50% of Average Median Income. In 2020 VAC provided housing support to 267 households. 76% of those identified as black, 22% white and 2% multiple races. In addition, VAC provides basic needs services including, but not limited to, an emergency food pantry, hygiene packs, feminine hygiene packs, diapers, formula, document assistance, medical copays, dental</p>

		<p>copays and vision assistance. Many housing clients take advantage of these wraparound services while engaged with the agency.</p> <p>2. A) Currently, Boone County does not offer a comprehensive shelter for the sheltered or unsheltered homeless population. VAC is currently working with Faith Voices, Turning Point, Loaves and Fishes and Room at the Inn to develop plans and secure funding for a facility that would provide a day center, overnight shelter, meals, showers, mail service, computer lab, medical clinic, case management, employment assistance and document assistance to the sheltered and unsheltered homeless population. This facility would be open 365 days per year and be fully staffed.</p> <p>2.B)C) &amp; D) Homelessness and the risk of homelessness remain significant in the City of Columbia. Missouri Balance of State's 1/29/2020 PIT report showed Region 5 with the highest rate of homelessness in the BoS with 446 people, 380 sheltered/66 unsheltered. Boone County had the highest rate of homelessness in the BoS by far, with 380 sheltered and 66 unsheltered. That total number for 2019 was 268. Missouri Balance of State's 2019 Homelessness Study shows a 32% increase in chronic homelessness from 2014 to 2018 in the BoS. HUD's 2013-2017 CHAS Data Query Tool indicates 14,770 of 31,155 renting Boone County households had housing cost burdens greater than 30% of income; 8,330 households had cost burdens greater than 50%.(4) These levels of cost burden make housing stability more tenuous, especially as our agency observes limited affordable housing stock in our community and, recently, increasing rental rates. Housing insecurity is a major contributor to community poverty. Boone County had 19.6% of its population identified as living at or</p>
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		<p>below the Federal poverty level in 2019, and the City of Columbia had 22.4% of its population at or below that level the same year. Each of these is significantly higher than national and state averages. Lack of affordable housing continues to be a significant need in the housing continuum. For a shelter to operate at maximum effectiveness, those using the shelter must have more affordable housing options than currently exist in Columbia/Boone County.</p> <p>3. Currently, Room at the Inn provides seasonal overnight shelter and Turning Point provides a day center option for the unsheltered. There is no comprehensive shelter option as noted in the response to question 2. Supportive services are provided by multiple agencies, including VAC. VAC provides a broad range of basic needs services and housing support services to assist those that are homeless or at risk of homelessness. Housing programs administered by VAC currently are directed at the homeless or those at risk of homelessness (ESG-Covid). VAC also provides housing assistance via ESG, MHTF, CDBG and EFSP. The biggest issue with VAC's housing programs is finding affordable housing. The inventory in this area is extremely low. Various agencies are working together to address this issue. CHA has plans that could help this.</p> <p>4. Gaps in the service delivery system have been described in previous responses. In short, a comprehensive emergency shelter and the inventory of affordable housing are both areas that need significant support and improvement.</p> <p>5. Especially during the Covid crisis, many households have struggled with maintaining an adequate income. This often results in an inability to pay rent. Households are falling behind on rent and find it all the more difficult over</p>
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		<p>time to meet that obligation. The pandemic has created significant mental stress on families. Families frequently move from one dwelling to another or sleep in their cars. In addition to stress created for parents, children often struggle as well. Frequent relocation impacts a child's ability to learn from a platform of a stable living environment. Landlords also feel the pressure as they depend on rent received to cover expenses, including property maintenance. This puts pressure on property owners which is then sometimes placed upon their tenants. As noted previously, the limited stock of affordable housing and rising rent costs contribute to this concern as well.</p> <p>6. Priority needs for the homeless or those at risk of homelessness would be a comprehensive emergency shelter as described in response 2 and a plan to increase the inventory of affordable housing options. The development of affordable housing is not something VAC is prepared to address at this time. However, the agency fully supports the efforts of CHA and collaborates with CHA and other agencies that are effective and active in this area. VAC welcomes partnerships focused on affordable housing. Additional rent assistance resources would allow VAC and other local agencies to continue to alleviate housing issues in Boone County. VAC has the capacity and history to effectively manage and distribute additional funds.</p> <p>7. In addition to keeping track of data that illustrates current needs, VAC works closely with other local social service agencies providing housing services. This is most especially illustrated in the work of the Functional Zero Task Force (FZTF), a consortium of local agencies who provide housing services. Meeting twice monthly, this group works through a by-name list of individuals and families in</p>
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			<p>need of housing. These meetings include discussions of the current housing situation, providing more information regarding available units and other data. Members of FZTF also refer to one another and informally inform one another of current housing circumstances. Conversations with local landlords provides additional information and perspectives.</p>
<b>Turning Point</b>	Day Center	Email Request	<p>Last year, Turning Point served 1,155 unduplicated individuals and provided a total of 18,911 units of service. For the first six months of 2021, Turning Point has served 761 unduplicated individuals and provided 8,816 units of service. Of these, 55% are White, 38% are Black or African-American, and 6% are another minority. Ethnically, 3% are Hispanic; 97% are non-Hispanic. By gender, 31% are female, and 69% are male.</p> <p>Turning Point is a day center providing basic needs for individuals experiencing homelessness. Our primary services include access to showers, laundry, phones, computers, coffee, hygiene products, resource referrals, a mailing address, and personal storage lockers. We also partner with other community agencies for additional services, such as the Wardrobe for clothing vouchers; the VA for veteran services; and Compass Health Network for medical, dental, and mental health services. Turning Point provides essential services for daily survival, operating with the mission to provide hope and restore dignity to those experiencing homelessness.</p>

		<p>Turning Point also helps individuals who are near homelessness with the same basic needs services as those offered to individuals experiencing homelessness. Additionally, we assist the newly housed get household supplies, such as large bottles of body wash, hair products, tubes of toothpaste, pillows, bedding, detergent, and furniture.</p> <p>Turning Point offers a congregate shelter unit by providing a Sleep Room where individuals can rest during organizational operating hours (7:30 am - 12:30 pm).</p> <p>Turning Point is currently operating with minimal staff who work almost exclusively on general operations. In order to better support and improve the organization itself, we would like to hire a Development Coordinator to expand our donor base and demographics, steward existing donor relationships, and strategize fundraising opportunities. This role will serve to expand community engagement by opening more volunteer opportunities and partnering with more local businesses, churches, and organizations. A Development Coordinator would greatly contribute to the sustainability and self-sustainability of Turning Point.</p> <p>Some of the common struggles our newly housed clients experience are: making rent and utility payments, especially when financial assistance ceases; conflicts with the landlord, particularly regarding house guests; and inability to retain employment. These are the most common issues we've seen clients struggle with that have led to housing instability and even evictions. We've also frequently seen clients with</p>
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			<p>criminal records have difficulty obtaining housing, especially after completing a sober living program and applying to other leasing agencies.</p> <p>Some of the most common and important needs our clients encounter are: finding emergency shelter due to limited capacity at the existing shelters, getting case management, and having reliable transportation to get to appointments in time.</p> <p>Turning Point logs each client who comes for services at the door immediately upon arrival. In addition to our internal records, we also input data into HMIS and run monthly, semi-annual, and annual reports. Every client is homeless or near homeless, and a unit of service is determined to be a day of services.</p>
<p><b>Services for Independent Living</b></p>	<p>Non-Profit Center for Independent Living</p>	<p>Email Request</p>	<p>Please describe size and demographic composition of the qualifying population you serve.</p> <p>Our organization serves people with disabilities, low-income seniors, and veterans. The consumers we serve mostly live on a fixed income: social security, social security disability, or pension. With limited affordable housing in Columbia, many of our consumers face a risk of homelessness with few options and long waitlists. Most of our consumers also lack the family or social support needed when facing financial barriers. When needing to move, our consumers have few options readily available for them. We serve cross-disabilities and cross-lifespan, serving people 13 and up. SIL serves around 1000 consumers a year, over 30% of those consumers are minorities.</p> <p>Unmet housing and service needs:</p>

		<p>While there are resources in Columbia for those at risk of homelessness, they are limited. Columbia Housing Authority has long waitlists, or the homes are not accessible. Some financial assistance exists, but it is one-time help and not monthly. And people that would like to move do not have the family assistance to physically move their belongings or cannot afford movers. For sheltered and unsheltered populations, we often hear complaints of limited space in shelters and all shelters closing at the same time. Mental health has a significant impact on homeless populations and with limited resources to assist in this area, people are unlikely to have access to stable shelter or support. Untreated mental illness, due to lack of resources or lack of insurance, can cause people with housing to neglect bills and rent to ultimately lose their housing.</p> <p>In Missouri, Medicaid will pay for caregiver services, both In Home Services and Consumer Directed Services are programs that we have, but the state continues to cut back the budget on these programs. This leaves people with disabilities at risk of losing a caregiver, being forced to move into a care facility and losing their independence. Family members can work for this person needing care, but the pay is minimal. Having to work for their family members limits the time they can spend in a different job to make more money.</p> <p>Some services in Columbia include:  Voluntary Action Center financial assistance- one time rent assistance and Motel assistance  Love Columbia-help finding housing, one-time furniture assistance  Welcome Home- temporary housing for Veterans  Salvation Army Harbor House- Emergency shelter, transitional housing</p>
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			<p>Turning Point-not a shelter, day center-open in the morning for mailing address and temporary storage  CHA affordable housing- lower rent homes  Room at the Inn-winter shelter  SAFHR COVID rental assistance-very difficult paperwork process</p> <p>While there are resources and shelters to cover all demographics, Columbia would benefit from more overnight shelters as well as day-time resource centers. Shelters easily reach their max so not everyone can get in and with few day-center options, this population has limited resources during the day. More day services need to be provided, outside of just storage or shelter, but to actually provide resources for mental health and job training. A shelter is needed, but there are other skills and resources essential for success.</p> <p>Again, affordable housing is limited in Columbia through waitlists or inaccessibility of the home.</p> <p>Priority needs would be more affordable, accessible housing, more day centers for job training, shelter, meals, etc., and more mental health resources specifically working with at-risk populations.</p>
<b>Great Circle</b>	Behavioral Health Services Provider	Email Request	<p>In 2020, Great Circle had 188 children residing in residential care on the Columbia campus. Their ages are 0-2 (4%), 3-5 (4%), 6-9 (7%), 10-14 (22%) and 15-19 (28%). It is these older children that are at the greatest risk of homelessness as they age out of the foster care system. The gender of the clients Great Circle serves are 44% male and 56% female with no client identifying as transgender or non-binary. The race of the youth served is representative of the central Missouri</p>

		<p>region, with 13% identifying as African American, 48% identifying as Caucasian, 1% Hispanic, 6% Multi-Racial and 32% unidentified.</p> <p>Our residential foster care houses children who are at risk of homelessness. Service needs include trauma requiring trauma informed care, capital improvements to our campus of care and residential cottages, and vehicles to enable case managers and care coordinators to ensure children receive regular supervised visits with their biological parents and siblings.</p> <p>Foster Care Case Manager provides, coordinates and facilitates all services necessary to support the permanency goal for the children in care. Case managers provide all duties related for safety/needs assessments, resource acquisition transportation/visitation, court reports, and authorization of funds for services to family members. Case management is provided to move children towards permanency effectively and within federal time frames, consistent with best practice to meet the children’s best interests. In the Central (Columbia, Missouri) region there are 19 case managers and 4 supervisors overseen by the Associate Director of Community Based Services.</p> <p>We serve low-income at-risk youth, as well as youth involved in the foster care system and children who are justice involved. We provide these children with residential services, therapeutic services and education through our accredited school (K – 12).</p> <p>Gaps include the need for repairs, renovations, and upgrades to existing residential treatment cottage buildings and support buildings to include</p>
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		<p>electrical and lighting, bathroom renovations, window replacements, improvements to concrete walkways, stairs, entrance areas, asphalt parking and driveway, emergency signage, wayfinding signage, and repairs to play areas.</p> <p>Youth in foster care have already experienced incredible trauma due to being removed from their families, becoming homeless, or experiencing other forms of instability. While schools should act as a critical protective factor to help students heal from these traumatic experiences, they too often fail to provide needed supports. Instead of being met with compassion from teachers, these students are often met with disciplinary actions that exacerbate their trauma and further the gap of academic success. To address the needs of all young people who have experienced trauma, Great Circle helps make the school on the Columbia campus a safe, supportive, and trauma-informed environment by improved hiring and training practices, creating trauma informed academic and care plans, and increased availability of trained social workers and counselors.</p> <p>This attention to trauma informed care is Great Circle’s highest priority, and often comes at the expense of our physical plants. So while the staff provide trauma informed care and education, the buildings in which the youth live and learn are in disrepair. Specifically, this requires hundreds of thousands of dollars in land improvements on our campuses and millions in repairs to our residential cottages and schools.</p> <p>Every year Great Circle prioritizes its capital improvements into Phase One</p>
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			(critical), Phase 2 (necessary) and Phase 3 (optimal). The graphic below illustrates the Phase One capital needs across the enterprise. Phase One capital improvements for Columbia total \$310,000, or 17% of the entire Phase One budget.
<b>Love Columbia</b>	Non-Profit Agency	Email Request	<p><i>Demographics of Qualifying Population:</i></p> <p>Since January of 2020 60% of our clients resided in households that are under 100% of the Federal Poverty Level. Thirty percent of our clients are under 50% of the Federal Poverty Level. Calculating AMI for our clients, 69% are below 30% AMI and 22% are between 31 and 50% AMI. Since we have only been collecting and documenting AMI on some clients since June and all clients since October, all the following demographic statistics will be based on clients who are less than 100% FPL.</p> <p><i>Of the 585 individuals who reported an income less than 100% of the FPL:</i></p> <ul style="list-style-type: none"> <li>• 13% are veterans</li> <li>• 76% are female, 21% male</li> <li>• 24% are disabled</li> <li>• 50% have a mental health diagnosis <ul style="list-style-type: none"> <li>○ 82% of those with mental health diagnosis have been prescribed medication</li> <li>○ 25% of those who have been prescribed medication report they are not taking it</li> </ul> </li> <li>• 50% report having a known chronic physical health problem</li> <li>• 40% are Caucasian, 48% African American, 5% Bi-racial, 3% Hispanic</li> <li>• 96% primary language is English</li> </ul>

			<ul style="list-style-type: none"> <li>• 60% single, 9% separated, 8% married, 2% widowed, 10% divorced, 3.7% domestic partner</li> <li>• 58% housed, 5% homeless unsheltered, 34% homeless sheltered</li> <li>• 24.5% lived here since childhood, 9.5% 5-10 years, 19% 1 to 5 years, 13% 3 months to a year, 13% less than 3 months</li> <li>• 12% reported having no supportive relationships, 16% reported having only one supportive relationship, 20% reported having only 2 supportive relationships, 15% reported having only 3 supportive relationships</li> <li>• Regarding their highest level of education, 28% had some college, 33% had completed HS or their HiSet, 20% had some high school, less than 2% had no high school education.</li> <li>• Reporting on their primary means of transportation: 58% own their own vehicle, 2% bicycle, 8% walk, 2% use taxis or Uber, 8% use public transportation, and 17% use someone else's car.</li> <li>• Regarding the status of their driver's license, 60% have a Missouri license, 5.5% have another state license, 23% have no license and 6% have a suspended license.</li> <li>• Clients reported the following barriers or challenges experienced: <ul style="list-style-type: none"> <li>○ Childcare: 10% (62/585)</li> <li>○ Criminal History: 20% (114/585)</li> <li>○ Education: 11% (65/585)</li> </ul> </li> </ul>
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			<ul style="list-style-type: none"> <li>○ Disability (Mental or Physical): 26% (156/585)</li> <li>○ Transportation: 38% (224/585)</li> <li>○ Income: 63% (370/585)</li> <li>○ Substance Use: 8% (46/585)</li> <li>○ Un/Under-Employment: 40% (233/585)</li> <li>○ Unstable/Unsafe Housing: 47% (277/585)</li> </ul> <p><b>Services Provided:</b></p> <p><i>For all of 2020:</i></p> <ul style="list-style-type: none"> <li>● 52% of all requests were housing related <ul style="list-style-type: none"> <li>○ Of those 52%, 20% were for hotel assistance, 47% were for rent or deposit assistance and 20% were for utility assistance, 11% were seeking housing coaching.</li> <li>○ November saw the highest number of housing related requests at 169 requests. 25 of those requests were specifically for hotel assistance</li> </ul> </li> </ul> <p><i>For Jan through Oct 2021:</i></p> <ul style="list-style-type: none"> <li>● 54% of all requests have been related to housing</li> <li>● Of those 54%, 14% were for hotel assistance, 43% were for rent or deposit and 18% were for utilities. 23% were seeking housing coaching.</li> <li>● 234 clients received assistance applying for SAFHR funds.</li> <li>● 565 Individuals have received a total of 1344 housing</li> </ul>
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			<p>coaching sessions. The average number of coaching sessions per client is 2.38. 37 clients secured transitional housing, 145 people secured housing, 92 of those who secured housing were previously homeless and 53 relocated to new housing. 65 clients maintained housing.</p> <ul style="list-style-type: none"> <li>• To demonstrate the interest in housing information, Love Columbia's website had the following views for the month of October 2021: 885 views of our housing openings list, 342 views of our housing help page and 249 views of our information library housing resources. This is in addition to sending our low cost (under \$1,000/month) housing openings list out to approximately 100 services providers.</li> </ul> <p>Since 2020 Love Columbia has provided \$236,927.77 for mortgage, rent and deposits and \$110,826 worth of hotel assistance. The average amount requested per person through SAFHR is \$3200 in rental assistance.</p> <p>Columbia lacks sufficient shelter and transitional housing capacity. Love Columbia started addressing the need for shelter/transitional housing for families with children in 2015, through our Extra Mile Homes program that has provided an average of six months housing for 40 families to date. In 2020, we started providing temporary hotel stays for families with children and people with fragile health who were experiencing homelessness. We are not able to respond to people with other situations and have a waiting list for our transitional homes program. Our local shelters provided very limited</p>
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		<p>assistance during the early months of the pandemic and, since then, even though they have accepted more people, many do not want to enter a congregate setting. Most have complex situations and need much support to take steps to move forward.</p> <p>We have rental assistance through city reserves through June and can refer to SAFHR to prevent evictions. We collaborate with VAC, Rock the Community and local churches who also provide rent assistance. Many of these families could benefit from ongoing case management and nearly all could benefit from financial coaching or career coaching. We have a two-week waiting period to get into our Path Forward program that provides extensive intake and case management. Our staff have caseloads that are too high to provide the level of services we believe is optimal. Prior to the pandemic, we tried to enroll every client experiencing housing instability into Path Forward. Due to the increased volume of requests for our services, we have to directly refer some to our coaching programs for immediate assistance. We would like to provide more case management and follow up, but need more staff to do this. Some enroll in our longer term financial coaching and career coaching which has been beneficial in ensuring ongoing housing stability.</p> <p>We include a financial assessment with all our services and address housing cost burdened situations by offering coaching to manage spending, reduce debt, create savings, or increase income. We also assess transportation which is a barrier to employment and help people create a plan to obtain reliable transportation. Our staff currently receives more referrals than</p>
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		<p>they can handle as quickly as we would like. We engage community volunteers to expand capacity and add to the social capital of our clients, but it takes time to recruit and train volunteers.</p> <p>We essentially need a “housing emergency room” with experienced staff always available to handle those in dire situations that require immediate attention. We are increasingly trying to move toward this by adding and repositioning staff within the organization to give more support to our clearinghouse department where initial requests are assessed and triaged. Our current staff is stretched thin and many people in these dire situations need immediate, and frequent contact as soon as they reach out for help.</p> <p>There are limited congregate beds available particularly for families with children (six rooms with four beds at Harbor House). There are housing choice vouchers available through CHA, but not enough landlords that will accept housing choice vouchers or people with past evictions or criminal backgrounds. Columbia has income-based housing (CHA, Columbia Square, Lakewood, Fairway Management) but not enough to meet need. There is some available low cost rental property (an average of 35-40 properties under \$1,000 on our weekly housing openings list), but about one-third less than a year ago and almost no three and four bedroom housing.</p> <p>Individuals and families who are living in hotels are at risk for becoming homeless if they cannot keep up with the daily or weekly rent. Some hotels have recently raised rent and stopped renting by the week or to people with a Columbia address.</p>
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		<p>Many people are in rentals where the landlords are raising rent at lease renewal. This is often without making any improvements to the property. Current tenants who cannot afford the rent increase must move out, but are struggling to find housing they can afford. Some families have been doubled up with relatives or friends and are not able to continue this for a variety of reasons. In some cases, they are jeopardizing the housing stability of those with whom they are staying as they are not officially on the lease. In other cases, the emotional strain of crowded conditions creates conflict or exacerbates mental health concerns. Some people have reported that their landlord will not make needed repairs so they cannot stay due to health risks or because the residence will no longer pass housing choice voucher inspection.</p> <p>Finally, in some cases, the tenant has allowed others to move in and these individuals cause rent violations or even force the original tenant out. We have most often seen this in the case of someone who has experienced homelessness and has many relationships in the homeless community or resultant compassion for the unhoused.</p> <p>Priorities needs are: to provide immediate housing (shelter or transitional housing), then permanent housing (income-based units, landlords who will accept housing choice vouchers) and, finally, support to maintain housing (case management, coaching to manage money and understand tenant rights and responsibilities along with other potentially needed services to support employment, mental health or substance use recovery).</p> <p>At Love Columbia, we receive a high volume of requests for assistance</p>
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			(110 per week). Because of this volume, we can easily determine gaps in local services. We are also part of various taskforces and networks where agencies compare requests for assistance and unmet needs.
<b>Central Missouri Community Action</b>	Community Action Agency	Email Request	<p>We serve families in 8 counties in Central Missouri but in Boone County only, approximately 13.63% of the households we serve have an income at or below 30% AMI.</p> <p>Based on 2019 ACS 5-year estimates, roughly 8630 households are at 30% or below AMI with 83.2% are renters and 16.8% are homeowners.</p> <p>In the CMCA Service area, 430 homeless persons with 51 total being unsheltered. In Boone County only, point in time counts show 268 homeless persons, with 43 of those being unsheltered. 26 Head Start and BRIDGE families were homeless at the time of application</p> <p>Currently in Boone County only, approximately 15,218 renters (51.6%) and 18.2% or 4,214 homeowners, are paying more than 30% of their income toward housing.</p> <p>10 Head Start and BRIDGE families were doubling up with each other and 15 families reported living in unaffordable, overcrowded, or transitional housing. Of our families in Boone County receiving any type of HUD subsidized housing</p> <p>Avg income \$13,749 Avg AMI 21% Female head of household 71% Disabled HOH, under age 61 is 42% Disabled HOH, above age 62 is 62% Average months on waiting list = 14 Those at greatest risk of housing instability or in unstable housing solutions</p>

		<p>In the beginning of 2020-2021 school year, 35 families reported crisis housing situations.</p> <p>CMCA provides HCV (Housing Choice Vouchers) but NOT in Boone County. Those are provided by Columbia Housing Authority.</p> <p>CMCA has energy and utility assistance available through our LIHEAP program. CMCA offers several programs within our Whole Family Approach system to assist with families gaining skills for employment or employment improvement. We also offer Head Start services, so families have affordable childcare and can work.</p> <p>Regarding shelters, we don't have any direct work with them. That said, we do hear from clients that they don't have room, don't take them in because of their pets, or won't have space for families.</p> <p>Regarding housing inventory, we see a large gap with the cost of construction and the appraisal values of homes. Inventory is historically low as well and most of what is on the market is not considered to be in an "affordable" price range.</p> <p>High rental prices  High utility costs due to lack of upkeep on the property  In areas without access to public transportation</p> <p>While it is not the work we are doing currently, it seems that those that fall within the parameters of Qualifying Populations would benefit the most from additional affordable housing rental communities. There are only 2 in Columbia (Columbia Square and Lakewood Apartments) other than the housing authority. All of these tend to have very long waiting lists.</p> <p>A shelter that can house families together and/or a transitional housing</p>
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			<p>facility would be a large benefit. CMCA has several supportive services that could be provided to these tenants to help them set and reach their goals to achieve housing stability.</p> <p>CMCA gathers our data during client intake into our programs. Program data is housed in our data system. This information, along with several other data collection sources, is used to complete a Community Needs Assessment. This assessment helps us determine the needs and shape our activities.</p>
<p><b>Columbia Housing Authority</b></p>	<p>Housing Authority</p>	<p>Email Request</p>	<p>The Columbia Housing Authority (CHA) currently serves 1,805 households that house 3,920 total persons. Of the 3,920 persons served, 61.6% are minority populations. 81% of CHA’s participants served make less than 30% the area median income, or less than \$18,000 per year for household of 2. The average gross annual income of all CHA residents served is \$13,875.68. CHA is our community’s largest affordable housing provider serving Columbia’s most vulnerable and low-income participants. CHA has experienced an increase in demand and an increase in referrals from local service providers. Currently, CHA has approximately 900 households on its waitlist for its housing programs. 90% of these households meet the McKinney-Vento definition of homeless as defined within the American Recovery Plan Act (ARPA), which means these households are living in hotels, shelters,</p>

			<p>transitional housing, doubled up with friends/family, or some other non-permanent and undesirable housing arrangement.</p> <p>The primary unmet housing and services needs for the qualifying populations the Columbia Housing Authority serves are the lack of supply of affordable housing. The Columbia Housing Authority (CHA) is seeking to preserve and expand its available affordable housing. The CHA currently has over 150 vouchers available for homeless and housing insecure populations, however there is very little affordable housing supply on the private market and our program participants cannot successfully match their voucher to an available unit. The Columbia Housing Authority has completed the renovation of 597 housing units it owns, however 120 public housing units remain that also need renovated. These remaining 120 units lack modern amenities including washer and dryer hookups, bath and CO exhaust fans, adequate insulation, modern sewer piping and systems and much more. The remaining 120 units require significant resources to maintain at minimum standard. The Columbia Housing Authority desires to fully renovate or redevelop these final units on the existing land these units are located to ensure these affordable units are preserved for</p>
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			<p>future generations and that these affordable units remain in the desirable downtown location. CHA's portfolio of affordable housing units has also not kept up with the growth in population in Columbia. CHA's original 719 units of public housing were completed by 1980 when Columbia's population was approximately 62,000. Now Columbia's population is over 126,000, however CHA's available affordable housing units has only grown to 753, demonstrating a need for significant expansion of its housing portfolio.</p> <p>In summary, the lack of supply of affordable housing is our community's most significant unmet need for qualified populations CHA serves, and CHA intends to seek ARPA resource to preserve and expand its portfolio of affordable housing. The City of Columbia coordinates, supports, and participates in the Columbia Homeless Outreach Team, which provides street outreach to unsheltered individuals. The street outreach team is comprised of staff from the Columbia Police department, the Harry S. Truman VA Hospital, and behavioral healthcare providers Phoenix Programs (funded by the City of Columbia) and New Horizons.</p> <p>The City of Columbia coordinates the annual point in time count of persons experiencing homelessness and is a key</p>
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			<p>partner in our community’s bi-annual Project Homeless Connect events. Through the coordinated entry process, our community tracks the exact number, name, and risk levels of all sheltered and unsheltered persons experiencing homelessness. The Functional Zero Task Force manages the By Name list and strives to ensure a “functional zero” number of homeless persons meaning our community’s goal is to have an equal amount of available shelter beds as there are literally homeless persons. Shelter beds are provided by Salvation Army, Welcome Home and other local service providers.</p> <p>The City of Columbia continues to strategically purchase social services to address homelessness, including: emergency shelter, mental health services, and housing case management. The City of Columbia has also coordinated with the faith community to develop and sustain the Turning Point homeless day center and the Room at the Inn winter emergency shelter, both of which are funded by the City of Columbia. In addition, the City of Columbia coordinates a network of warming/cooling centers throughout the community. The City also operates an overnight warming center program in cases of extreme cold weather. The overnight warming center is located in a City facility and is staffed by Columbia Police Department officers and homeless street outreach providers contracted by the City.</p> <p>The Columbia Housing Authority provides over 1,600 housing vouchers that are defined as</p>
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			<p>“Tenant Based Rental Assistance (TBRA).” TBRA is uniquely different than emergency housing assistance provided through the Voluntary Action Center (VAC), Love Columbia and other housing providers in that it models and aligns with HUD’s Section 8 Program and is for permanent housing assistance rather than emergency or transitional. HUD requires communities to align TBRA programs with local public housing authorities to ensure program goals and regulations are met and to reduce operational expenses. CHA currently has over 150 TBRA vouchers available and program participants are struggling to find available affordable housing, therefore additional TBRA would not be a strategic investment of funding.</p> <p>The Columbia Housing Authority is our community’s largest provider of permanent supportive affordable housing. CHA provides housing to over 1,800 households and maintains 753 of its own properties. CHA’s available housing portfolio has not kept pace with the growth in demand or Columbia’s population. By 1980, CHA finished completing the construction of 719 affordable housing units and Columbia’s population was 62,000. By 2021, Columbia’s population has more than doubles at over 126,000, however CHA’s available affordable housing units has only grown to 753. The most pressing affordable housing need for homeless and housing insecure</p>
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			<p>populations is to preserve and expand our available affordable housing units. The Columbia Housing Authority is our community's largest affordable housing provider and was created to carry out this specific role.</p> <p>The most significant gap in shelter and housing inventory is the lack of permanent affordable housing. The CHA received referrals daily from organizations such as the Voluntary Action Center, Love Columbia, Phoenix Programs and many more, and maintains approximately 900 households on CHA's waitlist for permanent affordable housing. There are currently 121 chronically homeless individuals on the Functional Zero Task Force's list and many of these individuals will make into CHA's housing programs (public housing or Section 8). Given historic rates of literally homeless populations that remain unsheltered, CHA staff estimates 50 literally homeless individuals will remain unhoused and will need to seek shelter during our community's coldest winter months. Given the ARPA restrictions on congregant shelter and the higher costs associated with running a congregant shelter vs. supportive housing, CHA staff recommends investing HOME ARPA funds into our largest gaps, which is the need for more permanent affordable housing units to serve the 900 individuals on CHA's waitlist.</p>
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			<p>There are also currently 157 Columbia Public Schools Children identified as being homeless as defined under the McKinney-Vento Act, 67 of which are living in hotels on the business loop. Insecure housing for children negatively impacts their ability to succeed in school. Each time a child moves, that child falls 5 weeks behind in curriculum while changing schools. Housing insecure families also experience higher rates of domestic violence and less opportunities to be involved in life enriching activities. Permanent and stable affordable housing is the best solution for homeless and housing insecure children and families, as shelter and transitional housing does not provide the permanency and stability needed for children to succeed in school.</p> <p>The characteristics of housing associated with instability and an increased risk of homelessness includes less desirable housing. The ARPA utilizes the McKinney-Vento Act to define and identify homeless and those at risk of homelessness. The Act identifies those at risk of homelessness as those that are 30% or below the area median income and experiencing 2 additional housing insecure experiences within the last 60 days. HUD also</p>
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			<p>defines households with “severe housing problems” as those with an incomplete kitchen facility, incomplete plumbing, more than 1.5 person per room and cost burdened greater than 50%. According to HUD Comprehensive Housing Affordability Strategy (CHAS) data there are currently over 7,940 renter households that meet the criteria of having “sever housing problems.” This means there are 7,940 renter households in Columbia that are at-risk of either being homeless or living in substandard housing situation. This is another data point that confirms the need for additional high quality affordable housing units for qualified populations identified within the ARPA.</p> <p>The priority needs of qualifying populations served is for additional permanent affordable housing with supportive services. FZTF data demonstrates a functional zero in terms of available shelter beds to demand for shelter and the CHA waitlist shows there are 900 households seeking a permanent, stable and affordable housing.</p> <p>The gaps and needs for housing were determined within this document by utilizing data provided by the City of Columbia Human Services Division, 2020-2024 Consolidated Plan, HUD Comprehensive Housing Affordability Strategy (CHAS)</p>
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			<p>data, Functional Zero Task Force data and the Columbia Housing Authority’s current waitlist.</p> <p>See additional responses on last page.</p>
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## Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive,
- The range of activities the PJ may undertake.

***Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:***

- ***Public comment period: start date - 2/1/2022 end date - 2/18/2022***
- ***Public hearing: 2/21/2022***

The Housing and Community Development Commission held a public hearing on November 3, 2021. Local agencies and citizens were invited to speak to the Commission about the unment

needs and gaps in the housing and service delivery systems in the City of Columbia. The Commission heard comments from: Love Columbia, The Columbia Housing Authority, RMF Community Bail Fund, Voluntary Action Center, and John Brown Gun Club. The City of Columbia City Council held a public hearing on February 21, 2022 to hear comments from citizens and local agencies on this HOME-ARP allocation plan.

***Describe any efforts to broaden public participation:***

On October 26, 2021 the Housing Programs Division hosted a Pre-Application Workshop open to the public and local agencies which provided information on HOME-ARP qualifying populations and eligible HOME-ARP projects.

The November 3, 2021 Housing and Community Development Commission meeting which contained the HOME-ARP public hearing was publically posted on the City Hall bulletin board as well as posted on the City of Columbia’s website ([www.como.gov](http://www.como.gov)).

The February 21, 2022 City of Columbia City Council meeting was publically posted on the City Hall bulletin board as well as posted on the City of Columbia’s website. A notice of public hearing was published in a notice in the Columbia Missourian newspaper and a notice of comment period from February 1, 2022 through February 18, 2022 was published in the Columbia Missourian newspaper.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

***Summarize the comments and recommendations received through the public participation process:***

Comments will be entered once the public comment period and public hearing session has been completed.

***Summarize any comments or recommendations not accepted and state the reasons why:***

Enter narrative response here.

## **Needs Assessment and Gaps Analysis**

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

***Describe the size and demographic composition of qualifying populations within the PJ's boundaries:***

From October 1, 2020 through October 1, 2021 the Salvation Army shelter served 324 individuals of which 72 were veterans, 27 were chronically homeless, 80 had a history of domestic violence and 32 were fleeing domestic violence. All had incomes under \$2000 per month.

Voluntary Action Center provided support to 267 households in 2020, of those 76% were black, 22% white, 2% multiple races.

Turning Point served 1,155 individuals and provided a total of 18,911 units of service in 2020. From January 1 through June 30, 2021 Turning Point served 761 individuals and provided 8,816 units of service.

Great Circle provided residential care to 188 children. 28% of those were ages 15-19 and at the biggest risk for homelessness.

60% of Love Columbia's served clients in 2020 were under the 100% Federal Poverty Level. 30% were under the 50% Federal Poverty Level. 54% of their clients have requests related to housing. 234 clients received assistance using SAFHR funds. 565 individuals received housing coaching sessions.

CMCA serves clients in an 8 county area and in Boone County alone 13.63% of households served were under the 30% AMI level.

The Columbia Housing Authority serves 1,805 households and 3,920 individuals, 61% of which are minorities. 81% make less than 30% of the area median income. There are 900 households on the waitlist for housing programs. 90% of those on the waitlist meet the McKinney-Vento definition of homeless.

***Describe the unmet housing and service needs of qualifying populations, including but not limited to:***

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness;***  
***and,***
- ***Those at greatest risk of housing instability or in unstable housing situations:***

Sheltered & Unsheltered Homeless Populations: Barriers existing for this population include limited affordable housing, limited landlords willing to work with at risk populations, limited public transportation. Mental Health has a significant impact on homeless populations and limited resources lead to people unlikely having access to stable shelter or support. Untreated mental illness due to a lack of resources or lack of insurance can cause people to neglect bills and rent which can lead to loss of housing. COVID-19 has reduced existing shelter capacity causing more individuals to be unsheltered. Sheltered homeless populations need education, training, and programs to increase knowledge on budgeting and housing expenses.

Those currently housed populations at risk for homelessness: For individuals and households at risk for homelessness there are many unmet housing and service needs. The lack of affordable housing equates to many households living in situations where they could lose their housing if

they were to experience a job loss or other income change. Those units that are affordable may lack modern amenities including washer dryer hookups, bath and exhaust fans, inadequate insulation, modern sewer piping, and other intergral household systems that are aged beyond their lifespan. Failures to these items leave a household in a difficult position to retain their housing. In addition, limited public transportation, limited rent assistance and limited utility assistance all contribute to a households' risk for homelessness.

Other families requiring services: For families requiring services or housing assistance to prevent homelessness barriers include limited rental and utility assistance programs, limited budget curriculums and limited affordable housing. Families receiving HUD subsidized housing have low annual incomes and can sometimes wait for long periods to receive services.

Those at greatest risk: Barriers for those at greatest risk include limited rental and utility assistance programs as well as permanent supportive housing. The lack of an emergency housing solution limits what agencies can do to provide services for an individual or family who find themselves suddenly homeless.

***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:***

Currently, Room at the Inn provides seasonal overnight shelter and Turning Point provides day center operations for the unsheltered. There is no comprehensive shelter option. The Columbia Housing Authority provides Housing Choice Vouchers for eligible households but there is a limited stock of rental housing available. Voluntary Action Center provides a broad range of basic needs services and housing support services to assist those that are homeless or at risk for homelessness. However, the lack of affordable housing limits the usefulness of rental assistance.

***Identify any gaps within the current shelter and housing inventory as well as the service delivery system:***

The shortage of affordable, safe, and maintained housing is the biggest gap in the shelter and housing inventory in the City. Agencies must also deal with staffing shortages and limited budgets for services. Other factors include the high cost of rental application and security deposits, landlord reluctance to work with high risk populations, and other issues like back rent or poor credit.

Other gaps include a lack of a congregate shelter, lack of transitional housing, lack of income based units, and the high cost of building new affordable housing.

***Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of "other populations" as established in the HOME-ARP Notice:***

The lack of affordable housing units in the main characteristic associated with the instability and increased risk of homelessness. During COVID many households struggled with maintaining adequate income. This often results in an inability to pay rent and/or falling behind on rent and

ultimately homelessness. Increases in rent, utilities, and other expenses compound a low income families ability to ensure financial obligations are met on a timely and consistent basis. Additional factors that lead to instability are lack of maintenance from property owners, mental and physical health associated with the COVID-19 pandemic, and distance from critical services without reliable transportation.

***Identify priority needs for qualifying populations:***

Additional permanent affordable housing is priority need for homeless and at-risk for homelessness populations. Local agencies are prepared to combine resources to see additional affordable housing is created and maintained for the benefit of reducing homelessness and at-risk for homelessness. Emergency shelters, day centers, job training, meals, access to mental health, and case management are also high priority needs for qualifying populations.

***Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:***

Local agencies utilize multiple sources of data to determine gaps and level of needs identified in this plan. The Functional Zero Task Force (FZTF) is a local consortium of agencies who provide services. This task force works through lists of households needing housing services. Community Needs Assessments, 2020-2024 Consolidated Plan, the Comprehensive Housing Affordability Strategy and Point in Time Count all assist in obtaining and evaluating data.

## **HOME-ARP Activities**

***Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:***

On October 26, 2021 the Housing Programs Division hosted a Pre-Application workshop for local agencies to learn about qualifying populations and HOME-ARP eligible projects. On November 8, 2021 a request for proposals was released seeking eligible HOME-ARP applications. A notice seeking HOME-ARP applications was published in the Columbia Missourian newspaper. In addition, notice was published on the City of Columbia's website seeking HOME-ARP applications. The City of Columbia's Housing Programs Division will administer all HOME-ARP eligible activities.

***If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:***

No HOME-ARP administrative funds were provided prior to HUD's acceptance of the HOME-ARP allocation plan.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 2,000,000		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 161,654	7.48 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 2,161,654</b>		

***Additional narrative, if applicable:***

Enter narrative response here.

***Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:***

Throughout the consultation process and public hearings, a consistent theme emerged, the lack of permanent affordable housing in the community leads to homelessness and increases the risk for homelessness. Local agencies identified the lack of affordable housing multiple times throughout their consultation responses. The lack of permanent affordable housing directly impacts their ability to provide services to the qualifying populations. Stable, safe, and affordable housing is the first step for families and individuals to move towards self-sufficiency. Local agencies recognize that combining efforts in their mission and resources can result in real change for at risk populations.

**HOME-ARP Production Housing Goals**

***Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:***

24

***Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ’s priority needs:***

The Columbia Housing Authority proposes to build a 24 unit permanent affordable housing development known as Kinney Point. The development will serve HOME-ARP qualifying

populations. The development of permanent affordable housing addresses the top priority need identified through the HOME-ARP consultation process and will result in a reduction of homeless and at-risk of homelessness families and individuals.

## **Preferences**

***Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:***

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

The City of Columbia does not intend to give preferences.

***If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

N/A

***If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:***

N/A

## **HOME-ARP Refinancing Guidelines**

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

The City of Columbia will not refinance existing debt with HOME-ARP funds.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

N/A

- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*

N/A

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*

N/A

- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

N/A

- *Other requirements in the PJ's guidelines, if applicable:*

N/A

## Catholic Charities- Social Services Outreach

Catholic Charities of Central and Northern Missouri services a total of 38 counties in central and northern Missouri. Catholic Charities provides services that include immigration services, refugee services, housing counseling, disaster case management, Hispanic resource coordination, and health and nutrition services.

Unsheltered homeless populations need additional shelters. Shelters not just in Columbia, but surrounding counties are at capacity. Due to COVID shelters have reduced their capacity, causing more individuals to be unsheltered. Sheltered homeless populations need, education, training, and programs to increase credit, and housing for individuals who might be convicted felons. Education on budgeting and housing expenses is also a need.

While the SAFHR funds are available, in our experience accessing these funds is difficult. The process is lengthy, often requiring multiple reapplications and burdensome on tenants. An easier way to access the funds to assist with rent or mortgage delinquency and to provide financial education and coaching as a requirement is a need.

Specifically in Columbia, there are a couple of shelters for individuals who are experiencing homelessness or recovering from addiction. Through Love Columbia there is also transitional housing for families who qualify for their program. Many social service agencies (CMCA, Voluntary Action Center, Catholic Charities, The Salvation Army) provide rental assistance typically based on FPL, citizenship, household composition, documentation, eviction status, and available funding. While there are section 8 vouchers and public housing, there is a waitlist for both programs.

Less than half of the Columbia residents own their homes.

Data from Headwaters Economics reported that in 2019 Columbia reported only 8.2% of available housing was vacant, with only 4% of the vacant housing units to be available to rent. This is lower than the reported housing vacancies across the US at 12.1%. This data shows that there are a lack of affordable rental units in Columbia.

One major gap in sheltering is for the population who is homeless during the winter. While Columbia has the Room at The Inn shelter that moves from church to church over the winter months. Establishing a permanent shelter for the unhoused population to go to in the winter or heat of summer is a gap in service delivery. Additionally, housing in Columbia is broken up into 50% being single family homes and roughly another 46% consisting of townhomes, apartment buildings and apartment complexes. Another gap is in single-family low-income housing stock.

Affordability of housing is a characteristic of instability and homelessness. With the small stock of available rental units, housing prices have inflated, making renting, or becoming a homeowner unrealistic for some individuals. Additionally, some low-income renters are living in substandard living conditions, often spending over \$500 a month in the winter or hot summer on utilities. When a family is spending over 20% of their income on utilities, the risk of falling behind on bills and becoming homeless increases.

City of Columbia Public Health and Human Services

Unmet needs: Health and mental services, detox services, expanded drop in center services, affordable housing, permanent supportive housing, transitional shelter, emergency shelter.

Needs of those at risk for homelessness: utility assistance, rent assistance, affordable housing, permanent supportive housing.

Gaps in current shelter and housing inventory: Lack of emergency shelter beds in spring, summer, and fall. Drop in center availability in afternoon, evenings, and weekends.

Characteristics associated with housing instability: unaffordable, low inventory, energy inefficient, in areas of high concentration of poverty, increasingly moving north and east away from urban core.

Priority needs: affordable housing, permanent supportive center, transitional shelter, emergency shelter, utility assistance, rent assistance.

Division of Human Services track monthly and annually using CE, PITC< and HIIC.

Show Me Central Habitat for Humanity- Non Profit Agency

Habitat for Humanity responded to the consultation request but did not have specific information available

The Food Bank of Northeast and Central Missouri- Non Profit Agency

The Food Bank responded to the consultation request but did not have specific information available



October 11, 2021

The City of Columbia has been awarded \$2,161,654 in American Rescue Plan funds through the HOME Investment Partnership Program (HOME-ARP) by the Department of Housing and Urban Development (HUD). The Housing Programs Division of the Community Development Department will be responsible for planning and administering HOME-ARP funds.

As part of the planning process, the City is required to consult with agencies and service providers whose clientele include HOME-ARP qualifying populations. The consultation process will identify unmet needs and gaps in housing or service delivery systems. In addition to the consultation process the Housing and Community Development Commission will hold a public meeting on Wednesday, November 3, 2021 to hear public comments in regards to HOME-ARP funding.

The Housing Programs Division has identified your agency as one that potentially works with or serves a qualifying population. (Please see attached for HUD's qualifying population definition). The following questions will assist in determining unmet needs and gaps in housing that exist in our community. Providing details and examples in your responses will further the understanding of the challenges present and strategies to address those challenges.

#### Consultation Questions

1. Please describe the size and demographic composition of the qualifying populations you serve.
2. Please describe the unmet housing and services needs of the qualifying populations you serve in regards to:
  - a) Sheltered and unsheltered homeless populations
  - b) Those currently housed populations at risk of homelessness
  - c) Other families requiring services or housing assistance or to prevent homelessness
  - d) Those at greatest risk of housing instability or in unstable housing solutions
3. Identify the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supporting rental housing.
4. Identify any gaps within the current shelter and housing inventory as well as the service delivery system.
5. Identify the characteristics of housing associated with instability and an increased risk of homelessness.
6. Identify priority needs for qualifying populations.

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*Our vision: Columbia is the best place for everyone to live, work, learn and play.*



7. Explain how the level of needs and gaps in shelter and housing inventory and service delivery systems are determined.

Please send your responses to Gary Anspach, Housing Programs Manager, no later than November 1, 2021. Housing Programs Staff will hold a HOME-ARP Pre-application workshop on Tuesday, October 26, 2021 at 6:30pm in Room 1A/1B of City Hall. The Pre-Application workshop will review the types of eligible HOME-ARP projects.

A Request for Proposals (RFP) for eligible HOME- ARP projects will be released in November following the HCDC public meeting.

Sincerely,

Gary Anspach

Housing Programs Division

City of Columbia

P.O. Box 6015

Columbia, MO 65205

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*Our vision: Columbia is the best place for everyone to live, work, learn and play.*

**HOME ARP Agency Consultation List**

Central Missouri Community Action  
Job Point  
Services for Independent Living  
Columbia Housing Authority  
Woodhaven  
Rainbow House  
Great Circle  
Habitat for Humanity  
Turning Point  
The Food Bank  
Love Columbia  
Voluntary Action Center  
Rock the Community  
Powerhouse Community Development  
First Chance for Children  
Columbia Community Land Trust  
The Salvation Army  
Shalom Christian Academy  
Catholic Charities  
Freedom House  
Columbia Center for Urban Ag.  
Grade A Plus  
Kidz Ink  
Columbia Interfaith- Room at the Inn  
Compass Health Network  
Phoenix Programs  
True North  
City of Columbia- Health and Human  
Services  
Boone County Social Services  
Welcome Home  
St. Francis Community  
New Horizons  
Boone County Family Resources  
Family Access Center of Excellence  
Flourish  
Heart of Missouri United Way

**Building & Site • CATSO • Housing Programs • Neighborhood Services • Planning • Volunteer Programs**

## Summary of Responses to HOME-ARP Consultation Questions

Agencies providing responses and other comments:

Salvation Army, Voluntary Action Center, Turning Point, Services for Independent Living, Great Circle, Love Columbia, Central Missouri Community Action, Columbia Housing Authority, The Food Bank for Central and Northeast Missouri, Habitat for Humanity, City of Columbia Public Health and Human Services, Catholic Charities.

### **1. Please describe the size and demographic composition of the qualifying populations you serve.**

Salvation Army- The shelter served 324 unduplicated people between 10/1/20 to 10/1/2021 including 72 veterans, 27 chronically homeless, 80 with a history of domestic violence and 32 fleeing domestic violence. All 324 with income under \$2000 per month. Social Services served 1304 from 10/1/20-10/1/21 providing over \$40,000 in rental and utility assistance.

Voluntary Action Center- VAC provides services to residents of Boone County whose income is at or below 200% of Federal Poverty Guidelines. Additional guidelines may be applicable, such as with the ESG which serves residents below 30% of Average Median Income, ESG-Covid and MHTF both of which serve residents below 50% of Average Median Income. In 2020 VAC provided housing support to 267 households. 76% of those identified as black, 22% white and 2% multiple races. In addition, VAC provides basic needs services including, but not limited to, an emergency food pantry, hygiene packs, feminine hygiene packs, diapers, formula, document assistance, medical copays, dental copays and vision assistance. Many housing clients take advantage of these wraparound services while engaged with the agency.

Turning Point- Last year, Turning Point served 1,155 unduplicated individuals and provided a total of 18,911 units of service. For the first six months of 2021, Turning Point has served 761 unduplicated individuals and provided 8,816 units of service. Of these, 55% are White, 38% are Black or African-American, and 6% are another minority. Ethnically, 3% are Hispanic; 97% are non-Hispanic. By gender, 31% are female, and 69% are male.

Services for Independent Living- Our organization serves people with disabilities, low-income seniors, and veterans. The consumers we serve mostly live on a fixed income: social security, social security disability, or pension. With limited affordable housing in Columbia, many of our consumers face a risk of homelessness with few options and long waitlists. Most of our consumers also lack the family or social support needed when facing financial barriers. When needing to move, our consumers have few options readily available for them. We serve cross-disabilities and cross-lifespan, serving people 13 and up. SIL serves around 1000 consumers a year, over 30% of those consumers are minorities.

Great Circle- In 2020, Great Circle had 188 children residing in residential care on the Columbia campus. Their ages are 0-2 (4%), 3-5 (4%), 6-9 (7%), 10-14 (22%) and 15-19 (28%). It is these older children that are at the greatest risk of homelessness as they age out of the foster care system. The gender of the clients Great Circle serves are 44% male and 56% female with no client identifying as transgender or non-binary. The race of the youth served is representative of the central Missouri region, with 13% identifying as African American, 48% identifying as Caucasian, 1% Hispanic, 6% Multi-Racial and 32% unidentified.

Love Columbia- Since January of 2020 60% of our clients resided in households that are under 100% of the Federal Poverty Level. Thirty percent of our clients are under 50% of the Federal Poverty Level. Calculating AMI for our clients, 69% are below 30% AMI and 22% are between 31 and 50% AMI. *For Jan through Oct 2021:*

- 54% of all requests have been related to housing
- Of those 54%, 14% were for hotel assistance, 43% were for rent or deposit and 18% were for utilities. 23% were seeking housing coaching.
- 234 clients received assistance applying for SAFHR funds.
- 565 Individuals have received a total of 1344 housing coaching sessions. The average number of coaching sessions per client is 2.38. 37 clients secured transitional housing, 145 people secured housing, 92 of those who secured housing were previously homeless and 53 relocated to new housing. 65 clients maintained housing.

- To demonstrate the interest in housing information, Love Columbia’s website had the following views for the month of October 2021: 885 views of our housing openings list, 342 views of our housing help page and 249 views of our information library housing resources. This is in addition to sending our low cost (under \$1,000/month) housing openings list out to approximately 100 services providers.

Since 2020 Love Columbia has provided \$236,927.77 for mortgage, rent and deposits and \$110,826 worth of hotel assistance. The average amount requested per person through SAFHR is \$3200 in rental assistance.

CMCA- We serve families in 8 counties in Central Missouri but in Boone County only, approximately 13.63% of the households we serve have an income at or below 30% AMI. Based on 2019 ACS 5-year estimates, roughly 8630 households are at 30% or below AMI with 83.2% are renters and 16.8% are homeowners.

Columbia Housing Authority- The Columbia Housing Authority (CHA) currently serves 1,805 households that house 3,920 total persons. Of the 3,920 persons served, 61.6% are minority populations. 81% of CHA’s participants served make less than 30% the area median income, or less than \$18,000 per year for household of 2. The average gross annual income of all CHA residents served is \$13,875.68. CHA is our community’s largest affordable housing provider serving Columbia’s most vulnerable and low-income participants. CHA has experienced an increase in demand and an increase in referrals from local service providers. Currently, CHA has approximately 900 households on its waitlist for its housing programs. 90% of these households meet the McKinney-Vento definition of homeless as defined within the American Recovery Plan Act (ARPA), which means these households are living in hotels, shelters, transitional housing, doubled up with friends/family, or some other non-permanent and undesirable housing arrangement.

Catholic Charities- Catholic Charities of Central and Northern Missouri services a total of 38 counties in central and northern Missouri. Catholic Charities provides services that include immigration services, refugee services, housing counseling, disaster case management, Hispanic resource coordination, and health and nutrition services.

**2. Please describe the unmet housing and services needs of the qualifying populations you serve in regards to:**

**a) Sheltered and unsheltered homeless populations**

Salvation Army- Limited affordable housing, limited landlords willing to work with at risk populations, limited public transportation

Voluntary Action Center- Currently, Boone County does not offer a comprehensive shelter for the sheltered or unsheltered homeless population. VAC is currently working with Faith Voices, Turning Point, Loaves and Fishes and Room at the Inn to develop plans and secure funding for a facility that would provide a day center, overnight shelter, meals, showers, mail service, computer lab, medical clinic, case management, employment assistance and document assistance to the sheltered and unsheltered homeless population. This facility would be open 365 days per year and be fully staffed.

Turning Point- Turning Point is a day center providing basic needs for individuals experiencing homelessness. Our primary services include access to showers, laundry, phones, computers, coffee, hygiene products, resource referrals, a mailing address, and personal storage lockers. We also partner with other community agencies for additional services, such as the Wardrobe for clothing vouchers; the VA for veteran services; and Compass Health Network for medical, dental, and mental health services. Turning Point provides essential services for daily survival, operating with the mission to provide hope and restore dignity to those experiencing homelessness.

Services for Independent Living- While there are resources in Columbia for those at risk of homelessness, they are limited. Columbia Housing Authority has long waitlists, or the homes are not accessible. Some financial assistance exists, but it is one-time help and not monthly. And people that would like to move do not have the family assistance to physically move their belongings or cannot afford movers. For sheltered and unsheltered populations, we often hear complaints of limited space in shelters and all shelters closing at the same time.

Mental health has a significant impact on homeless populations and with limited resources to assist in this area, people are unlikely to have access to stable shelter or support. Untreated mental illness, due to lack of resources or lack of insurance, can cause people with housing to neglect bills and rent to ultimately lose their housing. In Missouri, Medicaid will pay for caregiver services, both In Home Services and Consumer Directed Services are programs that we have, but the state continues to cut back the budget on these programs. This leaves people with disabilities at risk of losing a caregiver, being forced to move into a care facility and losing their independence. Family members can work for this person needing care, but the pay is minimal. Having to work for their family members limits the time they can spend in a different job to make more money.

Love Columbia- Columbia lacks sufficient shelter and transitional housing capacity. Love Columbia started addressing the need for shelter/transitional housing for families with children in 2015, through our Extra Mile Homes program that has provided an average of six months housing for 40 families to date. In 2020, we started providing temporary hotel stays for families with children and people with fragile health who were experiencing homelessness. We are not able to respond to people with other situations and have a waiting list for our transitional homes program. Our local shelters provided very limited assistance during the early months of the pandemic and, since then, even though they have accepted more people, many do not want to enter a congregate setting. Most have complex situations and need much support to take steps to move forward.

CMCA- In the CMCA Service area, 430 homeless persons with 51 total being unsheltered. In Boone County only, point in time counts show 268 homeless persons, with 43 of those being unsheltered. 26 Head Start and BRIDGE families were homeless at the time of application

City of Columbia PHHS- health and mental services, detox services, expanded drop in center services, affordable housing, permanent supportive housing, transitional shelter, emergency shelter.

Catholic Charities- Unsheltered homeless populations need additional shelters. Shelters not just in Columbia, but surrounding counties are at capacity. Due to COVID shelters have reduced their capacity, causing more individuals to be unsheltered. Sheltered homeless populations need, education, training, and programs to increase credit, and housing for individuals who might be convicted felons. Education on budgeting and housing expenses is also a need.

## **b) Those currently housed populations at risk of homelessness**

Salvation Army- Limited public transportation

Voluntary Action Center- Homelessness and the risk of homelessness remain significant in the City of Columbia. Missouri Balance of State's 1/29/2020 PIT report showed Region 5 with the highest rate of homelessness in the BoS with 446 people, 380 sheltered/66 unsheltered. Boone County had the highest rate of homelessness in the BoS by far, with 380 sheltered and 66 unsheltered. That total number for 2019 was 268. Missouri Balance of State's 2019 Homelessness Study shows a 32% increase in chronic homelessness from 2014 to 2018 in the BoS. HUD's 2013-2017 CHAS Data Query Tool indicates 14,770 of 31,155 renting Boone County households had housing cost burdens greater than 30% of income; 8,330 households had cost burdens greater than 50%.(4) These levels of cost burden make housing stability more tenuous, especially as our agency observes limited affordable housing stock in our community and, recently, increasing rental rates. Housing insecurity is a major contributor to community poverty. Boone County had 19.6% of its population identified as living at or below the Federal poverty level in 2019, and the City of Columbia had 22.4% of its population at or below that level the same year. Each of these is significantly higher than national and state averages. Lack of affordable housing continues to be a significant need in the housing continuum. For a shelter to operate at maximum effectiveness, those using the shelter must have more affordable housing options than currently exist in Columbia/Boone County.

Turning Point- Turning Point also helps individuals who are near homelessness with the same basic needs services as those offered to individuals experiencing homelessness. Additionally, we assist the newly housed get household supplies, such as large bottles of body wash, hair products, tubes of toothpaste, pillows, bedding, detergent, and furniture.

Great Circle- Our residential foster care houses children who are at risk of homelessness. Service needs include trauma requiring trauma informed care, capital improvements to our campus of care and residential cottages, and vehicles to enable case managers and care coordinators to ensure children receive regular supervised visits with their biological parents and siblings.

Love Columbia- We have rental assistance through city reserves through June and can refer to SAFHR to prevent evictions. We collaborate with VAC, Rock the Community and local churches who also provide rent assistance.

Many of these families could benefit from ongoing case management and nearly all could benefit from financial coaching or career coaching. We have a two-week waiting period to get into our Path Forward program that provides extensive intake and case management. Our staff have caseloads that are too high to provide the level of services we believe is optimal. Prior to the pandemic, we tried to enroll every client experiencing housing instability into Path Forward. Due to the increased volume of requests for our services, we have to directly refer some to our coaching programs for immediate assistance. We would like to provide more case management and follow up, but need more staff to do this. Some enroll in our longer term financial coaching and career coaching which has been beneficial in ensuring ongoing housing stability.

CMCA- Currently in Boone County only, approximately 15,218 renters (51.6%) and 18.2% or 4,214 homeowners, are paying more than 30% of their income toward housing. 10 Head Start and BRIDGE families were doubling up with each other and 15 families reported living in unaffordable, overcrowded, or transitional housing.

Columbia Housing Authority- The primary unmet housing and services needs for the qualifying populations the Columbia Housing Authority serves are the lack of supply of affordable housing. The Columbia Housing Authority (CHA) is seeking to preserve and expand its available affordable housing. The CHA currently has over 150 vouchers available for homeless and housing insecure populations, however there is very little affordable housing supply on the private market and our program participants cannot successfully match their voucher to an available unit. The Columbia Housing Authority has completed the renovation of 597 housing units it owns, however 120 public housing units remain that also need renovated. These remaining 120 units lack modern amenities including washer and dryer hookups, bath and CO exhaust fans, adequate insulation, modern sewer piping and systems and much more. The remaining 120 units require significant resources to maintain at minimum standard. The Columbia Housing Authority desires to fully renovate or redevelop these final units on the existing land these units are located to ensure these affordable units are preserved for future generations and that these affordable units remain in the desirable downtown location. CHA's portfolio of affordable housing units has also not kept up with the growth in population in Columbia. CHA's original 719 units of public housing were completed by 1980 when Columbia's population was approximately 62,000. Now Columbia's population is over 126,000, however CHA's available affordable housing units has only grown to 753, demonstrating a need for significant expansion of its housing portfolio.

City of Columbia PHHS- utility assistance, rent assistance

Catholic Charities- While the SAFHR funds are available, in our experience accessing these funds is difficult. The process is lengthy, often requiring multiple reapplications and burdensome on tenants. An easier way to access the funds to assist with rent or mortgage delinquency and to provide financial education and coaching as a requirement is a need.

### **c) Other families requiring services or housing assistance or to prevent homelessness**

Salvation Army- Limited budget curriculum, limited rental and utility assistance programs

Love Columbia- We include a financial assessment with all our services and address housing cost burdened situations by offering coaching to manage spending, reduce debt, create savings, or increase income. We also assess

transportation which is a barrier to employment and help people create a plan to obtain reliable transportation. Our staff currently receives more referrals than they can handle as quickly as we would like. We engage community volunteers to expand capacity and add to the social capital of our clients, but it takes time to recruit and train volunteers.

CMCA- Of our families in Boone County receiving any type of HUD subsidized housing Avg income \$13,749, Avg AMI 21%, Female head of household 71%, Disabled HOH, under age 61 is 42%, Disabled HOH, above age 62 is 62%, Average months on waiting list = 14

City of Columbia PHHS- Affordable housing, utility assistance, rent assistance.

**d) Those at greatest risk of housing instability or in unstable housing solutions**

Salvation Army- Limited budgeting curriculum, limited rental and utility assistance programs

Love Columbia- We essentially need a “housing emergency room” with experienced staff always available to handle those in dire situations that require immediate attention. We are increasingly trying to move toward this by adding and repositioning staff within the organization to give more support to our clearinghouse department where initial requests are assessed and triaged. Our current staff is stretched thin and many people in these dire situations need immediate, and frequent contact as soon as they reach out for help.

CMCA- In the beginning of 2020-2021 school year, 35 families reported crisis housing situations.

City of Columbia PHHS- affordable housing, permanent supportive housing

**3. Identify the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supporting rental housing.**

Salvation Army- Year round emergency shelter that houses single men, women, and adults with children, congregate public meals at the emergency shelter, TBRA vouchers, RRH vouchers, Section 8 vouchers.

Voluntary Action Center- Currently, Room at the Inn provides seasonal overnight shelter and Turning Point provides a day center option for the unsheltered. There is no comprehensive shelter option as noted in the response to question 2. Supportive services are provided by multiple agencies, including VAC. VAC provides a broad range of basic needs services and housing support services to assist those that are homeless or at risk of homelessness. Housing programs administered by VAC currently are directed at the homeless or those at risk of homelessness (ESG-Covid). VAC also provides housing assistance via ESG, MHTF, CDBG and EFSP. The biggest issue with VAC’s housing programs is finding affordable housing. The inventory in this area is extremely low. Various agencies are working together to address this issue. CHA has plans that could help this.

Turning Point- Turning Point offers a congregate shelter unit by providing a Sleep Room where individuals can rest during organizational operating hours (7:30 am - 12:30 pm).

Great Circle- Foster Care Case Manager provides, coordinates and facilitates all services necessary to support the permanency goal for the children in care. Case managers provide all duties related for safety/needs assessments, resource acquisition transportation/visitation, court reports, and authorization of funds for services to family members. Case management is provided to move children towards permanency effectively and within federal time frames, consistent with best practice to meet the children’s best interests. In the Central (Columbia, Missouri) region there are 19 case managers and 4 supervisors overseen by the Associate Director of Community Based Services.

Love Columbia- There are limited congregate beds available particularly for families with children (six rooms with four beds at Harbor House). There are housing choice vouchers available through CHA, but not enough landlords that will accept housing choice vouchers or people with past evictions or criminal backgrounds. Columbia has income-based housing (CHA, Columbia Square, Lakewood, Fairway Management) but not enough

to meet need. There is some available low cost rental property (an average of 35-40 properties under \$1,000 on our weekly housing openings list), but about one-third less than a year ago and almost no three and four bedroom housing.

CMCA- CMCA provides HCV (Housing Choice Vouchers) but NOT in Boone County. Those are provided by Columbia Housing Authority. CMCA has energy and utility assistance available through our LIHEAP program. CMCA offers several programs within our Whole Family Approach system to assist with families gaining skills for employment or employment improvement. We also offer Head Start services, so families have affordable childcare and can work.

Columbia Housing Authority- The Columbia Housing Authority provides over 1,600 housing vouchers that are defined as "Tenant Based Rental Assistance (TBRA)." TBRA is uniquely different than emergency housing assistance provided through the Voluntary Action Center (VAC), Love Columbia and other housing providers in that it models and aligns with HUD's Section 8 Program and is for permanent housing assistance rather than emergency or transitional. HUD requires communities to align TBRA programs with local public housing authorities to ensure program goals and regulations are met and to reduce operational expenses. CHA currently has over 150 TBRA vouchers available and program participants are struggling to find available affordable housing, therefore additional TBRA would not be a strategic investment of funding.

The Columbia Housing Authority is our community's largest provider of permanent supportive affordable housing. CHA provides housing to over 1,800 households and maintains 753 of its own properties. CHA's available housing portfolio has not kept pace with the growth in demand or Columbia's population. By 1980, CHA finished completing the construction of 719 affordable housing units and Columbia's population was 62,000. By 2021, Columbia's population has more than doubles at over 126,000, however CHA's available affordable housing units has only grown to 753. The most pressing affordable housing need for homeless and housing insecure populations is to preserve and expand our available affordable housing units. The Columbia Housing Authority is our community's largest affordable housing provider and was created to carry out this specific role.

Catholic Charities- Specifically in Columbia, there are a couple of shelters for individuals who are experiencing homelessness or recovering from addiction. Through Love Columbia there is also transitional housing for families who qualify for their program. Many social service agencies (CMCA, Voluntary Action Center, Catholic Charities, The Salvation Army) provide rental assistance typically based on FPL, citizenship, household composition, documentation, eviction status, and available funding. While there are section 8 vouchers and public housing, there is a waitlist for both programs. Less than half of the Columbia residents own their homes. Data from Headwaters Economics reported that in 2019 Columbia reported only 8.2% of available housing was vacant, with only 4% of the vacant housing units to be available to rent. This is lower than the reported housing vacancies across the US at 12.1%. This data shows that there are a lack of affordable rental units in Columbia.

#### **4. Identify any gaps within the current shelter and housing inventory as well as the service delivery system.**

Salvation Army- Lack of affordable housing, lack of landlords willing to work with at risk populations, high rental deposits, high rental application fees.

Voluntary Action Center- Gaps in the service delivery system have been described in previous responses. In short, a comprehensive emergency shelter and the inventory of affordable housing are both areas that need significant support and improvement.

Turning Point- Turning Point is currently operating with minimal staff who work almost exclusively on general operations. In order to better support and improve the organization itself, we would like to hire a Development Coordinator to expand our donor base and demographics, steward existing donor relationships, and strategize fundraising opportunities. This role will serve to expand community engagement by opening more volunteer

opportunities and partnering with more local businesses, churches, and organizations. A Development Coordinator would greatly contribute to the sustainability and self-sustainability of Turning Point.

Services for Independent Living- While there are resources and shelters to cover all demographics, Columbia would benefit from more overnight shelters as well as day-time resource centers. Shelters easily reach their max so not everyone can get in and with few day-center options, this population has limited resources during the day. More day services need to be provided, outside of just storage or shelter, but to actually provide resources for mental health and job training. A shelter is needed, but there are other skills and resources essential for success.

Great Circle- Gaps include the need for repairs, renovations, and upgrades to existing residential treatment cottage buildings and support buildings to include electrical and lighting, bathroom renovations, window replacements, improvements to concrete walkways, stairs, entrance areas, asphalt parking and driveway, emergency signage, wayfinding signage, and repairs to play areas.

Love Columbia- There is a shortage of housing throughout the entire range of housing: congregate shelter, transitional housing, income-based units, landlords that will accept housing choice vouchers, low cost market-rate rentals, lower cost homes to purchase. More support services, particularly case management, is needed for those experiencing housing instability.

CMCA- Regarding shelters, we don't have any direct work with them. That said, we do hear from clients that they don't have room, don't take them in because of their pets, or won't have space for families. Regarding housing inventory, we see a large gap with the cost of construction and the appraisal values of homes. Inventory is historically low as well and most of what is on the market is not considered to be in an "affordable" price range.

Columbia Housing Authority- The most significant gap in shelter and housing inventory is the lack of permanent affordable housing. The CHA received referrals daily from organizations such as the Voluntary Action Center, Love Columbia, Phoenix Programs and many more, and maintains approximately 900 households on CHA's waitlist for permanent affordable housing. There are currently 121 chronically homeless individuals on the Functional Zero Task Force's list and many of these individuals will make into CHA's housing programs (public housing or Section 8). Given historic rates of literally homeless populations that remain unsheltered, CHA staff estimates 50 literally homeless individuals will remain unhoused and will need to seek shelter during our community's coldest winter months. Given the ARPA restrictions on congregant shelter and the higher costs associated with running a congregant shelter vs. supportive housing, CHA staff recommends investing HOME ARPA funds into our largest gaps, which is the need for more permanent affordable housing units to serve the 900 individuals on CHA's waitlist.

There are also currently 157 Columbia Public Schools Children identified as being homeless as defined under the McKinney-Vento Act, 67 of which are living in hotels on the business loop. Insecure housing for children negatively impacts their ability to succeed in school. Each time a child moves, that child falls 5 weeks behind in curriculum while changing schools. Housing insecure families also experience higher rates of domestic violence and less opportunities to be involved in life enriching activities. Permanent and stable affordable housing is the best solution

for homeless and housing insecure children and families, as shelter and transitional housing does not provide the permanency and stability needed for children to succeed in school.

City of Columbia PHHS- lack of emergency shelter beds in spring, summer, and fall. Drop in center availability in afternoons, evenings, and weekends.

Catholic Charities- One major gap in sheltering is for the population who is homeless during the winter. While Columbia has the Room at The Inn shelter that moves from church to church over the winter months. Establishing a permanent shelter for the unhoused population to go to in the winter or heat of summer is a gap in service delivery. Additionally, housing in Columbia is broken up into 50% being single family homes and roughly another 46% consisting of townhomes, apartment buildings and apartment complexes. Another gap is in single-family low-income housing stock.

## **5. Identify the characteristics of housing associated with instability and an increased risk of homelessness.**

Salvation Army- Affordable housing units in poor shape, landlords don't invest in up keep and/or repairs.

Voluntary Action Center- Especially during the Covid crisis, many households have struggled with maintaining an adequate income. This often results in an inability to pay rent. Households are falling behind on rent and find it all the more difficult over time to meet that obligation. The pandemic has created significant mental stress on families. Families frequently move from one dwelling to another or sleep in their cars. In addition to stress created for parents, children often struggle as well. Frequent relocation impacts a child's ability to learn from a platform of a stable living environment. Landlords also feel the pressure as they depend on rent received to cover expenses, including property maintenance. This puts pressure on property owners which is then sometimes placed upon their tenants. As noted previously, the limited stock of affordable housing and rising rent costs contribute to this concern as well.

Turning Point- Some of the common struggles our newly housed clients experience are: making rent and utility payments, especially when financial assistance ceases; conflicts with the landlord, particularly regarding house guests; and inability to retain employment. These are the most common issues we've seen clients struggle with that have led to housing instability and even evictions. We've also frequently seen clients with criminal records have difficulty obtaining housing, especially after completing a sober living program and applying to other leasing agencies.

Services for Independent Living- Again, affordable housing is limited in Columbia through waitlists or inaccessibility of the home.

Great Circle- Youth in foster care have already experienced incredible trauma due to being removed from their families, becoming homeless, or experiencing other forms of instability. While schools should act as a critical protective factor to help students heal from these traumatic experiences, they too often fail to provide needed supports. Instead of being met with compassion from teachers, these students are often met with disciplinary actions that exacerbate their trauma and further the gap of academic success. To address the needs of all young people who have experienced trauma, Great Circle helps make the school on the Columbia campus a safe, supportive, and trauma-informed environment by improved hiring and training practices, creating trauma informed academic and care plans, and increased availability of trained social workers and counselors. This attention to trauma informed care is Great Circle's highest priority, and often comes at the expense of our physical plants. So while the staff provide trauma informed care and education, the buildings in which the youth live and learn are in disrepair. Specifically, this requires hundreds of thousands of dollars in land improvements on our campuses and millions in repairs to our residential cottages and schools.

Love Columbia- Individuals and families who are living in hotels are at risk for becoming homeless if they cannot keep up with the daily or weekly rent. Some hotels have recently raised rent and stopped renting by the week or to people with a Columbia address.

Many people are in rentals where the landlords are raising rent at lease renewal. This is often without making any improvements to the property. Current tenants who cannot afford the rent increase must move out, but are struggling to find housing they can afford. Some families have been doubled up with relatives or friends and are not able to continue this for a variety of reasons. In some cases, they are jeopardizing the housing stability of

those with whom they are staying as they are not officially on the lease. In other cases, the emotional strain of crowded conditions creates conflict or exacerbates mental health concerns.

Some people have reported that their landlord will not make needed repairs so they cannot stay due to health risks or because the residence will no longer pass housing choice voucher inspection.

Finally, in some cases, the tenant has allowed others to move in and these individuals cause rent violations or even force the original tenant out. We have most often seen this in the case of someone who has experienced homelessness and has many relationships in the homeless community or resultant compassion for the unhoused.

CMCA- High rental prices, high utility costs due to lack of upkeep on the property. In areas without access to public transportation

Columbia Housing Authority- The characteristics of housing associated with instability and an increased risk of homelessness includes less desirable housing. The ARPA utilizes the McKinney-Vento Act to define and identify homeless and those at risk of homelessness. The Act identifies those at risk of homelessness as those that are 30% or below the area median income and experiencing 2 additional housing insecure experiences within the last 60 days. HUD also defines households with “severe housing problems” as those with an incomplete kitchen facility, incomplete plumbing, more than 1.5 person per room and cost burdened greater than 50%. According to HUD Comprehensive Housing Affordability Strategy (CHAS) data there are currently over 7,940 renter households that meet the criteria of having “sever housing problems.” This means there are 7,940 renter households in Columbia that are at-risk of either being homeless or living in substandard housing situation. This is another data point that confirms the need for additional high quality affordable housing units for qualified populations identified within the ARPA.

City of Columbia PHHS- Unaffordable, low inventory, energy inefficient, in areas of high concentration of poverty, increasingly moving north and east away from urban core.

Catholic Charities- Affordably of housing is a characteristic of instability and homelessness. With the small stock of available rental units, housing prices have inflated, making renting, or becoming a homeowner unrealistic for some individuals. Additionally, some low-income renters are living in substandard living conditions, often spending over \$500 a month in the winter or hot summer on utilities. When a family is spending over 20% of their income on utilities, the risk of falling behind on bills and becoming homeless increases.

## **6. Identify priority needs for qualifying populations.**

Salvation Army- Affordable housing units, program to help clean the slate for at risk tenants

Voluntary Action Center- Priority needs for the homeless or those at risk of homelessness would be a comprehensive emergency shelter as described in response 2 and a plan to increase the inventory of affordable housing options. The development of affordable housing is not something VAC is prepared to address at this time. However, the agency fully supports the efforts of CHA and collaborates with CHA and other agencies that are effective and active in this area. VAC welcomes partnerships focused on affordable housing. Additional rent assistance resources would allow VAC and other local agencies to continue to alleviate housing issues in Boone County. VAC has the capacity and history to effectively manage and distribute additional funds.

Turning Point- Some of the most common and important needs our clients encounter are: finding emergency shelter due to limited capacity at the existing shelters, getting case management, and having reliable transportation to get to appointments in time.

Services for Independent Living- Priority needs would be more affordable, accessible housing, more day centers for job training, shelter, meals, etc., and more mental health resources specifically working with at-risk populations.

Great Circle- Every year Great Circle prioritizes its capital improvements into Phase One (critical), Phase 2 (necessary) and Phase 3 (optimal). The graphic below illustrates the Phase One capital needs across the enterprise. Phase One capital improvements for Columbia total \$310,000, or 17% of the entire Phase One budget.

Love Columbia- Priorities needs are: to provide immediate housing (shelter or transitional housing), then permanent housing (income-based units, landlords who will accept housing choice vouchers) and, finally, support to maintain housing (case management, coaching to manage money and understand tenant rights and responsibilities along with other potentially needed services to support employment, mental health or substance use recovery).

CMCA- While it is not the work we are doing currently, it seems that those that fall within the parameters of Qualifying Populations would benefit the most from additional affordable housing rental communities. There are only 2 in Columbia (Columbia Square and Lakewood Apartments) other than the housing authority. All of these tend to have very long waiting lists. A shelter that can house families together and/or a transitional housing facility would be a large benefit. CMCA has several supportive services that could be provided to these tenants to help them set and reach their goals to achieve housing stability.

Columbia Housing Authority- The priority needs of qualifying populations served is for additional permanent affordable housing with supportive services. FZTF data demonstrates a functional zero in terms of available shelter beds to demand for shelter and the CHA waitlist shows there are 900 households seeking a permanent, stable and affordable housing.

City of Columbia PHHS- Affordable housing, permanent supportive housing, transitional shelter, emergency shelter, utility assistance, rent assistance.

## **7. Explain how the level of needs and gaps in shelter and housing inventory and service delivery systems are determined.**

Salvation Army- Case managers at social service agencies screen clients for housing priority and they are placed on prioritization list. Housing voucher awards are based on client's placement on the prioritization list.

Voluntary Action Center- In addition to keeping track of data that illustrates current needs, VAC works closely with other local social service agencies providing housing services. This is most especially illustrated in the work of the Functional Zero Task Force (FZTF), a consortium of local agencies who provide housing services. Meeting twice monthly, this group works through a by-name list of individuals and families in need of housing. These meetings include discussions of the current housing situation, providing more information regarding available units and other data. Members of FZTF also refer to one another and informally inform one another of current housing circumstances. Conversations with local landlords provides additional information and perspectives.

Turning Point- Turning Point logs each client who comes for services at the door immediately upon arrival. In addition to our internal records, we also input data into HMIS and run monthly, semi-annual, and annual reports. Every client is homeless or near homeless, and a unit of service is determined to be a day of services.

Love Columbia- At Love Columbia, we receive a high volume of requests for assistance (110 per week). Because of this volume, we can easily determine gaps in local services. We are also part of various taskforces and networks where agencies compare requests for assistance and unmet needs.

CMCA- CMCA gathers our data during client intake into our programs. Program data is housed in our data system. This information, along with several other data collection sources, is used to complete a Community Needs Assessment. This assessment helps us determine the needs and shape our activities.

Columbia Housing Authority- The gaps and needs for housing were determined within this document by utilizing data provided by the City of Columbia Human Services Division, 2020-2024 Consolidated Plan, HUD Comprehensive Housing Affordability Strategy (CHAS) data, Functional Zero Task Force data and the Columbia Housing Authority's current waitlist.

City of Columbia PHHS- Division of Human Services tracks monthly and annually using CE, PITC, and HIC.

# **City Council Meeting HOME-ARP Public Hearing**

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City of Columbia

Monday February 21, 2022



# HOME-ARP Background

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- March 11, 2021- President Biden signed the American Rescue Plan (ARP) into law. \$1.9 Trillion in relief to address the continued impact of the COVID-19 Pandemic.
- Congress appropriated \$5 billion in ARP funds to be administered through the HOME Investment Partnership program.
- The City of Columbia has been awarded \$2,161,654 million in HOME-ARP funding.

# Qualifying Populations

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- HOME-ARP requires that funds be used to primarily benefit individuals and families in the following specified “qualifying populations.”
  - Homeless
  - At Risk for Homelessness
  - Fleeing or Attempting to Flee Domestic Violence, Sexual Assault, Stalking, or Human Trafficking
  - Other populations defined as homeless under various federal laws.

# Eligible Projects

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- HOME-ARP eligible projects include:
  - Non-Congregate Shelters
  - Affordable Rental Housing
  - Supportive Services
  - Tenant Based Rental Assistance (TBRA)

## HOME-ARP Consultation

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- Consultation is a HUD required process that Housing Programs started October 11, 2021.
- Consultations were sent to 36 different agencies seeking feedback and input regarding homelessness, services, and unmet needs.
- Responses received from 12 agencies.
- Main Themes:
  - Limited affordable housing
  - Lack of shelter and transitional shelter
  - Cost of construction of housing
  - Lack of income to pay for rent, food, child care
- Consultation responses are included in the HOME-ARP allocation plan.

# HOME-ARP Consultation

HOME-ARP Consultation invitations sent to the following agencies:

CMCA	Job Point	Services for Independent Living	Columbia Housing Authority
Woodhaven	Rainbow House	Great Circle	Habitat for Humanity
Turning Point	Central Mo Food Bank	Love Columbia	Voluntary Action Center
Rock the Community	Powerhouse Community Development	First Chance for Children	Columbia Community Land Trust
The Salvation Army	Shalom Christian Academy	Catholic Charities	Freedom House
Columbia Center for Urban Agriculture	Grade A Plus	K.I.D.Z. Ink	Columbia Interfaith
Compass Health Network	Phoenix Programs	True North	City of Columbia- PHHS
Boone County Social Services	Welcome Home	St. Francis Community	New Horizons
Boone County Family Resources	Family Access Center of Excellence	Flourish	Heart of Missouri United Way

# Additional HOME-ARP Outreach

- Public Notices & Public Hearings
  - October 26, 2021- Pre-application workshop at City Hall for local agencies and citizens to learn about eligible project types and qualifying populations.
  - November 3, 2021- Housing and Community Development Commission public hearing. Local agencies and citizens report on unmet needs and barriers currently existing for qualifying populations.
  - November 8, 2021- Request for Proposals public notice.
  - February 1, 2022- Public notice of 15 day comment period on HOME-ARP Allocation Plan.
  - February 21, 2022- City Council Public Hearing on HOME-ARP Allocation Plan.

# Funding Process Timeline

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- October 11, 2021- Consultation questions sent to community agencies.
- October 26, 2021- Pre-Application Workshop.
- November 1, 2021- Consultation responses due.
- November 3, 2021- HCDC Public Information Meeting.
- November 8, 2021- Request for Proposals released.
- November 19, 2021- Letters of Intent Due.
- December 6, 2021- Request for Proposals Due.
- December 15, 2021- HCDC Meeting to hear HOME-ARP & HOME Project Proposals.
- December 22, 2021- HCDC Meeting to finalize funding recommendations.
- February 21, 2022- City Council to consider HOME-ARP Allocation Plan.
- Summer 2022- Environmental Reviews to be completed.
- Fall 2022- Agreements signed and funds become available.

# HOME-ARP Proposal

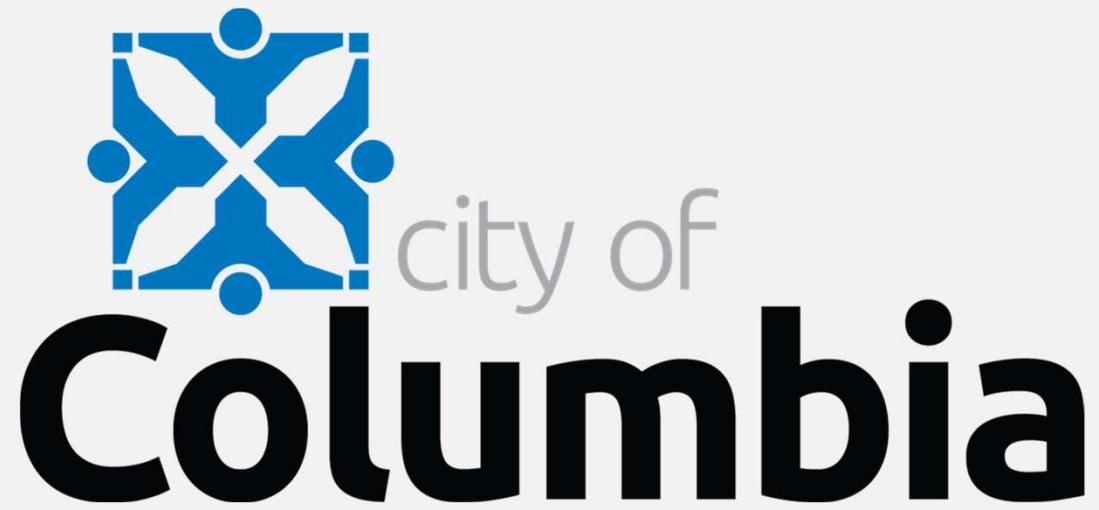
- The Housing and Community Development Commission heard project proposals at their December 15, 2021 meeting.
- The Commission voted unanimously to recommend the following funding allocations:

Housing and Community Development Commission HOME-ARP Funding Recommendations		
<u>Organization</u>	<u>Project</u>	<u>Amount</u>
<b>Columbia Housing Authority</b>	Kinney Point- 24 Units	\$2,000,000
<b>Administration</b>	Staff Administration	\$161,654
	<b>Total</b>	<b>\$2,161,654</b>

# HOME-ARP Proposal

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- The Columbia Housing Authority is proposing a 24 unit affordable housing development at the corner of Sexton and Garth to be known as Kinney Point.
- The new housing will primarily benefit homeless and at-risk for homeless individuals and families.
- The project addresses a central theme of the consultation responses of a lack of affordable housing.



Introduced by Treece Council Bill No. R 25-22

**A RESOLUTION**

approving Amendment No. 1 to the FY 2021 CDBG and HOME Annual Action Plan to incorporate the HOME-ARP Allocation Plan; authorizing the City Manager to submit the document to the Department of Housing and Urban Development.

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF COLUMBIA, MISSOURI, AS FOLLOWS:

SECTION 1. The Amendment No. 1 to the FY 2021 CDBG and HOME Annual Action Plan to incorporate the HOME-ARP Allocation Plan, substantially as set forth in "Exhibit A" attached hereto and made a part hereof, is approved. The following HOME-ARP eligible projects are included in the Allocation Plan:

- Columbia Housing Authority: The development of twenty-four (24) affordable housing units with the construction of the Kinney Point Apartments to be located on the northeast corner of Garth Avenue and Sexton Road. Funding allocated: \$2,000,000.00
- Administrative Activities: Staffing, record-keeping, environmental review, and compliance monitoring. Funding allocated: \$161,654.00

SECTION 2. The City Manager is authorized to submit Amendment No. 1 to the FY 2021 CDBG and HOME Annual Action Plan to incorporate the HOME-ARP Allocation Plan to the Department of Housing and Urban Development (HUD).

ADOPTED this 21st day of February, 2022.

ATTEST:

  
\_\_\_\_\_  
City Clerk

  
\_\_\_\_\_  
Mayor and Presiding Officer

APPROVED AS TO FORM:

  
\_\_\_\_\_  
City Counselor

A/P

NOV 24 2021

11:10 AM

CITY OF COL. - HOUSING PROGRAMS DIVISION  
P.O. BOX 6015  
COLUMBIA, MO 65205-6015

# AFFIDAVIT OF PUBLICATION AND INVOICE

PQ #20220571 Invoice #31010062

SEE ATTACHED

STATE OF MISSOURI

County of Boone

} ss.  
}

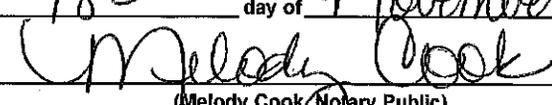
I, Bryan Chester, being duly sworn according to law state that I am one of the publishers of the Columbia Missourian, a daily newspaper of general circulation in the County of Boone where located: which has been admitted to the Post Office as second class matter in the City of Columbia, Missouri the city of publication: which newspaper has been published regularly and consecutively for a period of three years and has a list of bona fide subscribers voluntarily engaged as such who have paid or agreed to pay a stated price for a subscription for a definite period of time, and that such newspaper has complied with the provision of Section 493.050, Revised Statutes of Missouri, 1969. The affixed notice appeared in said newspaper on the following consecutive issues:

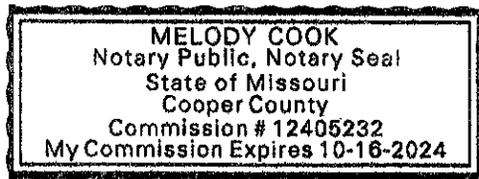
- 1st Insertion ..... November 18, 2021
- 2nd Insertion ..... 2021
- 3rd Insertion ..... 2021
- 4th Insertion ..... 2021
- 5th Insertion ..... 2021
- 6th Insertion ..... 2021
- 7th Insertion ..... 2021
- 8th Insertion ..... 2021
- 9th Insertion ..... 2021
- 10th Insertion ..... 2021
- 11th Insertion ..... 2021
- 12th Insertion ..... 2021
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- 16th Insertion ..... 2021
- 17th Insertion ..... 2021
- 18th Insertion ..... 2021
- 19th Insertion ..... 2021
- 20th Insertion ..... 2021
- 21st Insertion ..... 2021

COLUMBIA MISSOURIAN PRINTER'S FEE \$63.20

By:   
(Bryan Chester, General Manager)

Subscribed and sworn to before me this 18<sup>th</sup> day of November, 2021

  
(Melody Cook, Notary Public)  
My Commission Expires October 16, 2024



**REQUEST FOR APPLICATIONS:  
HOME INVESTMENT PARTNERSHIP-  
AMERICAN RESCUE PLAN (HOME-ARP) & FY2022 HOME**

The City of Columbia anticipates receiving \$2,161,654 in Home Investment Partnership Program- American Rescue Plan (HOME-ARP) funds from the Department of Housing and Urban Development. HOME-ARP eligible projects include Non-Congregate Shelters, Rental Housing Development, Supportive Services, and Tenant Based Rental Assistance. All HOME-ARP projects must primarily benefit homeless or at-risk for homeless populations.

The City of Columbia also intends to allocate \$205,000 in FY2022 HOME funds from the Department of Housing and Urban Development. Eligible HOME projects include homeownership assistance, rental housing development, tenant based rental assistance, new home construction. All HOME assisted projects must benefit lower income households.

Applications for HOME-ARP and FY 2022 HOME funds are currently being accepted through the City of Columbia's Housing Programs Division. Interested applicants must submit a letter of intent to the City of Columbia's Housing Programs Division no later than 11:59pm on Friday November 19, 2021.

Completed applications are due by 11:59pm on Monday December 6, 2021.

Applications are available at the City of Columbia's Housing Programs Division office located at 500 E. Walnut St. Suite 108, Columbia, MO 65201. The City of Columbia does not discriminate on the basis of race, color, religion, sex, national origin, ancestry, marital status, familial status, disability or sexual orientation. If you wish to receive an application or have any questions regarding the application procedure, contact Gary Anspach at (573) 874-6321 or e-mail Gary.Anspach@CoMo.gov

CITY OF COL. - HOUSING PROGRAMS DIVISION  
P.O. BOX 6015  
COLUMBIA, MO 65205-6015

## AFFIDAVIT OF PUBLICATION AND INVOICE

PO #20220571 Invoice #31010525

SEE ATTACHED

STATE OF MISSOURI

County of Boone

} ss.

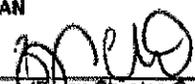
I, Bryan Chester, being duly sworn according to law state that I am one of the publishers of the Columbia Missourian, a daily newspaper of general circulation in the County of Boone where located: which has been admitted to the Post Office as second class matter in the City of Columbia, Missouri the city of publication: which newspaper has been published regularly and consecutively for a period of three years and has a list of bona fide subscribers voluntarily engaged as such who have paid or agreed to pay a stated price for a subscription for a definite period of time, and that such newspaper has complied with the provision of Section 493.060, Revised Statutes of Missouri, 1969. The affixed notice appeared in said newspaper on the following consecutive issues:

1st Insertion	February 1, 2022
2nd Insertion	2022
3rd Insertion	2022
4th Insertion	2022
5th Insertion	2022
6th Insertion	2022
7th Insertion	2022
8th Insertion	2022
9th Insertion	2022
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16th Insertion	2022
17th Insertion	2022
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19th Insertion	2022
20th Insertion	2022
21st Insertion	2022

COLUMBIA MISSOURIAN

PRINTER'S FEE 47.40

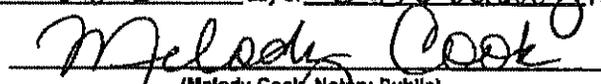
By: \_\_\_\_\_



(Bryan Chester, General Manager)

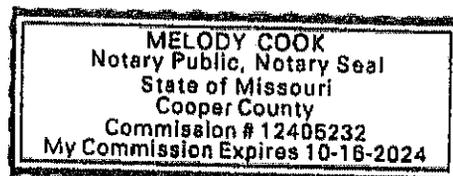
Subscribed and sworn to before me this

22nd day of February, 2022



(Melody Cook, Notary Public)

My Commission Expires October 16, 2024



### NOTICE OF PUBLIC HEARING

#### AMENDMENT TO THE 2021 COMMUNITY DEVELOPMENT ACTION PLAN

The City of Columbia will hold a public hearing at 7:00 p.m. on Monday February 21, 2022, in the Council Chambers of City Hall, 701 E. Broadway. The purpose of this hearing is to receive citizen input on a proposed amendment to the City's Action Plan for FY 2021, which is contained within the 2020-2024 Consolidated Plan. The Action Plan was approved by Council on April 19, 2021. The City of Columbia amends its Action Plans whenever it removes a project not previously approved; or substantially changes the purpose, scope, location or beneficiaries of a project. The proposed amendment allows the submission of the HOME-ARP (American Rescue Plan) Allocation Plan.

<b>HOME-ARP Uses</b>	<b>Amount</b>
<i>Columbia Housing Authority- Kinney Point</i>	<i>\$ 2,000,000</i>
<i>HOME-ARP Administration</i>	<i>\$ 161,654</i>
<i>Total</i>	<i>\$ 2,161,654</i>

The proposed Action Plan amendment will be available for review and comment at 500 E. Walnut St., Suite 108 until 5:00 P.M., Friday February 18, 2022; or can be viewed on the City's website at [www.cmo.gov/community-development/housing-programs-division/](http://www.cmo.gov/community-development/housing-programs-division/). For further information contact the Housing Program Manager at 573-874-6321. 500 E. Walnut, Suite 108, is an accessible facility for persons with disabilities; any person with special needs may call (573) 874-6321. Telecommunications for the deaf is available at 1-800-MOR-ELAY. The City of Columbia does not discriminate on the basis of race, color, religion, sex, national origin, ancestry, marital status, familial status, disability status or sexual orientation.

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: 02/22/2022	4. Applicant Identifier: M-21-MP-29-0502	
5a. Federal Entity Identifier: U.S. Department of HUD	5b. Federal Award Identifier: M-21-MP-29-0502	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: City of Columbia		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 43-60000810	* c. UEI: 071989024000 WZR4KM9CBTV3	
<b>d. Address:</b>		
* Street1: P.O. Box 6015 701 E. Broadway	Street2: <input type="text"/>	
* City: Columbia	County/Parish: <input type="text"/>	
* State: MO: Missouri	Province: <input type="text"/>	
* Country: USA: UNITED STATES	* Zip / Postal Code: 65205-6015	
<b>e. Organizational Unit:</b>		
Department Name: Community Development	Division Name: Housing Programs	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: Mr.	* First Name: Gary	
Middle Name: L.	* Last Name: Anspach	
Suffix: <input type="text"/>	Title: Housing Programs Manager	
Organizational Affiliation: City of Columbia		
* Telephone Number: 573-874-6321	Fax Number: <input type="text"/>	
* Email: gary.anspach@como.gov		

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.239

CFDA Title:

HOME-ARP (HOME- American Rescue Plan)

**\* 12. Funding Opportunity Number:**

M-21-MP-29-0502

\* Title:

HOME-ARP (HOME- American Rescue Plan)

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

A 24 unit permanent affordable housing project located in the City of Columbia for HOME-ARP qualifying populations as a continued response to the COVID-19 pandemic.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

4

\* b. Program/Project

4

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

10/01/2022

\* b. End Date:

09/30/2023

**18. Estimated Funding (\$):**

* a. Federal	2,161,654.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	2,161,654.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?** a. This application was made available to the State under the Executive Order 12372 Process for review on b. Program is subject to E.O. 12372 but has not been selected by the State for review. c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (if "Yes," provide explanation in attachment.)** Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

 \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

Mr.

\* First Name:

De'Carlon

Middle Name:

\* Last Name:

Seewood

Suffix:

\* Title:

City Manager

\* Telephone Number:

573-874-7111

Fax Number:

573-442-8828

\* Email:

decarlon.seewood@como.gov

\* Signature of Authorized Representative:

DocuSigned by:

De'Carlon Seewood

8564D3D77E5D43D

PS

\* Date Signed:

10/22/2022

**ASSURANCES - NON-CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

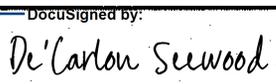
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<p>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> <p>DocuSigned by:    <small>9564D9D77F5D480...</small></p> <p style="text-align: right;">DS  </p>	<p>TITLE</p> <p>City Manager</p>
<p>APPLICANT ORGANIZATION</p> <p>City of Columbia</p>	<p>DATE SUBMITTED</p> <p>02/22/2022</p>

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

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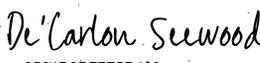
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<p>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> <p>DocuSigned by:    <small>8564D9D77E5D420</small></p>	<p>TITLE</p> <p>City Manager</p>
<p>APPLICANT ORGANIZATION</p> <p>City of Columbia</p>	<p>DATE SUBMITTED</p> <p>02/22/2022</p>

## **HOME-ARP CERTIFICATIONS**

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

<p>DocuSigned by:  8664D3D77F6D430...</p>		<p>2/22/2022</p>
<p>Signature of Authorized Official</p>		<p>Date</p>
<p>City Manager</p>		
<p>Title</p>		